

LJF:UAD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-535

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UNITED STATES OF AMERICA

TO BE FILED UNDER SEAL

- against -

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF APPLICATION
FOR ARREST WARRANT

SANDRA MANUELA RODRIGUEZ,

Defendant.

(T. 18, U.S.C., § 545)

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EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER VERDEJO, being duly sworn, deposes and states that he is a New York City Police Department detective assigned to the United States Department of Homeland Security, Immigration and Customs Enforcement El Dorado Task Force, duly appointed according to law and acting as such.

Upon information and belief, on or about December 28, 2009, within the Eastern District of New York and elsewhere, the defendant SANDRA MANUELA RODRIGUEZ did fraudulently, knowingly and intentionally import and bring into the United States merchandise contrary to law.

(Title 18, United States Code, Section 545).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about December 28, 2009, the defendant SANDRA MANUELA RODRIGUEZ arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Avianca Airlines flight no. 284 from Bogota, Colombia. RODRIGUEZ was selected for a Customs and Border Protection ("CBP") examination.

2. RODRIGUEZ was questioned about her customs declaration card, in which she stated that she was carrying emeralds valued at \$50,000. A CBP officer asked RODRIGUEZ whether she was carrying any emeralds other than those declared on the customs card. RODRIGUEZ stated in sum and substance that she was not.

3. CBP officers retrieved the declared emeralds from RODRIGUEZ's purse. The emeralds totaled 41 in number. Based on their size and shape, the emeralds appeared to be worth significantly more than \$50,000. Additionally, a search of RODRIGUEZ's jacket produced eight more emeralds, which RODRIGUEZ failed to declare on her customs declaration card.

4. RODRIGUEZ subsequently stated, in sum and substance, her belief that the 41 declared emeralds were actually worth \$536,000, and not \$50,000.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for RODRIGUEZ so that she may be dealt with according to law.

Det Christopher Verdejo
CHRISTOPHER VERDEJO
Detective
NYPD, El Dorado Task Force

Sworn to before me this
7th day of May, 2010

THE HONOR
UNITED ST
EASTERN I

S/ Reyes

JR.
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